

REMARKS

I. Introduction

Claims 1-7, 9-26 and 28-43 are all the claims pending in the application and each claim stands rejected. These remarks address each point of rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

As a preliminary matter, Applicants call the Examiner's attention to pages 8-10 of the Office Action. Applicants understand the Examiner to be relying on U.S. Patent No. 6,647,396 to Parnell et al. (Parnell) as a prior art reference in rejecting claims 38-43 under 35 U.S.C. § 102(e), although the Office Action cites Jensen as the basis for the rejection.

II. Claim Rejections - 35 U.S.C. § 102 (e)

A. Claims 1-6, 14-19, 20-25 and 33-37

As noted above, claims 1-6, 14-19, 20-25 and 33-37 stand rejected under section 102 (e) as allegedly being anticipated by Parnell. Applicants respectfully traverse the rejection.

Independent claim 1 is directed to a method of representing a multimedia content management object. The claim recites, "using the item defined by the relational database tables to construct a plurality of high level content management data models, each corresponding to a different application." The Examiner takes the position that Parnell discloses this feature of claim 1 by describing classification based content which is utilized for different content management object operation models where each model is associated with a different operation (See Office Action: page 3-4). Applicants respectfully disagree.

The Examiner seems to allege that different operations performed by Parnell's content management system are equivalent to data models disclosed in claim 1. However, operations

performed by Parnell's system have to do with internal functions to manage content whereas claim 1 recites "using the item defined by the relational database tables to construct a plurality of high level content management data models." (See Parnell: col 6, lines 56-59). Applicants respectfully submit that the example of a "user administering a web site" cited by the Examiner does not disclose constructing "a plurality of high level content management data models, each corresponding to a different application," as required by claim 1 (See Office Action: page 3, Parnell: col. 6. lines 50-52).

Furthermore, Parnell relates to a classification based content management system. In Parnell, there are different *items* of content within a database (Parnell: col. 1, lines 48-50, 59-60). Parnell's content management system functions by classifying such items of content within its database (Parnell: col. 1 lines 48-54, 59-65). However, Parnell does not disclose that these items of content are a "plurality of high level content management data models, each corresponding to a different application," as recited in claim 1. Parnell is simply not concerned with constructing a plurality of data models. Rather, Parnell seeks to manage large amounts of content quickly and easily through the classification of content items (Parnell: col. 1, lines 36-39). Accordingly, Parnell does not disclose "using the item defined by the relational database tables to construct a plurality of high level content management models, each corresponding to a different application," as required by claim 1.

In addition, col. 5, lines 36-45 and Figure 4 of Parnell, which shows a table ECMREVISION, are cited by the Examiner for disclosing "associating attributes of the root component with corresponding columns of the first relational database table" (See Office Action: page 3). However, the cited portion of Parnell does not disclose that attributes of the

ECMREVISION table are associated with corresponding columns of the ECMREVISION table.

In fact, Parnell unequivocally discloses that ECMREVISION table 410 “represents a *single* [emphasis added], immutable version of a document” (See Parnell: col. 5, lines 36-37). Hence, Applicants respectfully submit that Parnell does not disclose “associating attributes of the root component with corresponding columns of the first relational database table,” as recited in claim 1.

In light of the differences discussed above, Applicants respectfully submit that claim 1 is not anticipated by Parnell. Consequently, claims 2-6 are not anticipated by Parnell, at least by virtue of their dependency from claim 1.

Independent claims 14, 20 and 33 are traversed under the same rationale as mentioned for claim 1. Claims 15-19, 21-25, 34-37 are not anticipated by Parnell, at least by virtue of their dependency.

B. Claims 7, 9-13, 26 and 28-32

Claims 7, 9-13, 26, 28-32 stand rejected under section 102 (e) as allegedly being anticipated by Parnell.

Independent claim 7 is directed to a method of representing a multimedia content management object, the method including, “mapping the metadata and schema to the data engine, wherein the low level physical model supports a plurality of high level content models.” The Examiner asserts that Parnell discloses these features in figure 1 where a single API 104 is shown to be linked to the database 106. (See Office Action: page 6).

Applicants respectfully disagree. Figure 1 of Parnell plainly shows a *single* API portion 104 attached to the Database portion 106 (Parnell: col. 3, lines 15-23). Parnell simply does not disclose supporting “a plurality of high level content models” recited in claim 7.

For the foregoing reasons, Applicants respectfully submit that claim 7 is not anticipated by Parnell. Consequently, claims 9-13 are not anticipated by Parnell, at least by virtue of their dependency from claim 7. Independent claim 26 is traversed under the same rationale as mentioned for claim 7. Claims 28-32 are not anticipated by Parnell, at least by virtue of their dependency to claim 26.

C. Claims 38-43

Claims 38-43 stand rejected under section 102 (e) as allegedly being anticipated by Parnell.

Independent claim 38 is directed to a method of populating a multimedia content management system, the method including “presenting a query to a user as to a content item.” The Examiner takes the position that Parnell discloses this feature through “querying database for requested tag to reference and execute against metadata for content” (See Office Action: page 8). Applicants respectfully disagree.

It has long been held that “a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987); MPEP § 2131. Furthermore, “the identical invention must be shown in as complete detail as is

contained in the claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); MPEP § 2131.

Here, the Examiner alleges that Parnell’s querying of database discloses a query to a user. However, by the plain language of claim 38, the database and the user are separate and distinct elements of the claim. Parnell’s content management content servlet (CMCS) works by querying the database 106, and *not* by presenting a query to a user (Parnell: col. 3, lines 37-39). Therefore, disclosing querying a database does not disclose querying an end user.

For the foregoing reasons, Applicants respectfully submit that claim 38 is not anticipated by Parnell. Consequently, claims 39-43 are not anticipated by Parnell, at least by virtue of their dependency from claim 38.

III. Conclusion

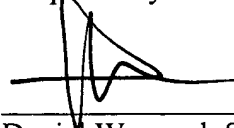
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

RESPONSE UNDER 37 C.F.R. §1.111
Application Number: 10/091,919

Our Ref: A8829
Art Unit: 2167

Respectfully submitted,



Daniel Wooseob Shim
Registration No. 56,995

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: September 28, 2005